

**UNITED STATES PROBATION
AND PRETRIAL SERVICE**

MEMORANDUM

DATE: October 1, 2021

TO: Honorable Michael J. Roemer
U.S. Magistrate Judge

FROM: Michael R. Macaluso
U.S. Probation Officer Specialist

SUBJECT: Peter Gerace, Jr.
0209 1:19CR00227-003
Motion to Modify Conditions of Release

On March 4, 2021, Mr. Gerace was arraigned before Your Honor on a second superseding indictment charging him with **Count 2:** Title 18 U.S.C. § 371 - Conspiracy to defraud the United States; **Count 6:** Title 18 U.S.C. § 201(b)(1)(C) – Bribery; **Count 7:** Title 21 U.S.C. § 841(a)(1) -Maintaining a Drug Involved Premises; **Count 8:** Title 21 U.S.C. § 846 - Conspiracy to possess with intent to distribute controlled substances; and **Count 9** Title 18 U.S.C. § 1951 – Conspiracy to Commit Sex Trafficking.

Since the defendant has been under pretrial supervision, he has been compliant with his conditions of release. He began his supervision which included electronic monitoring (home detention component) monitored via G.P.S. at his approved residence on March 4, 2021. Since that time, the defendant has followed all rules and regulations of the program and has maintained good communication with this office. All substance abuse tests taken from the defendant have been negative and there have been no electronic monitoring violations.

Based on the defendant's compliance, this office is recommending that the release condition of electronic monitoring (home detention component) be modified to curfew, with such curfew to be set by the U.S. Probation Office. If you have any questions, feel free to contact this officer at (716) 362-5290.

cc: Brendan T. Cullinane, AUSA
Steven M. Cohen, Defense Attorney